

1. All information and data collected regarding air emission sampling conducted by EPA Region 5 at and around the New-Indy mill in Catawba, South Carolina on April 26-27, 2021. Two EPA Region 5 representatives drove a mobile air emission collection vehicle around the plant property on April 26 and April 27. The Region 5 representatives drove around the local community on those days and possibly the weekend before. Also, on April 27, the EPA representatives took air samples from summa canisters at the mill. Additionally, EPA personnel inspected with hand-held monitors.
 - a. Real time data collected from the mobile collection vehicle when the vehicle was collecting data at the mill and off-site.
 - b. A GPS map of the locations at which the vehicle collected data, and times of collections.
 - c. All summa canister (and any other sampling) data (including analytical procedures, QA/QC procedures, calibration standards, frequency, calibration gas and chain of custody).
 - d. EPA's sampling and emission collection plan/protocol describing the method of collection and instrumentality used.
 - e. Data from the inspectors' emission monitors.
2. All information and data that form a basis for EPA's May 11, 2021 Draft Emergency Order, including without limitation:
 - a. Notes of EPA's consultation with representatives of DHEC, York County, SC and Mecklenburg County, NC referenced in paragraph 4 of the Order.
 - b. All data and information that form a basis for EPA's findings that hydrogen sulfide causes "adverse health effects." See paragraph 13.
 - c. All complaints SCDHEC provided to EPA that are referenced in the Order (See, e.g., paragraph 14).
 - d. All complaints EPA has received regarding the New-Indy plant. See paragraph 17, including all records of EPA's investigation of those complaints.
 - e. Data from the inspectors' 4-gas monitors (during all three days of inspection). See paragraph 20.
 - f. All data and information regarding two EPA personnel's alleged adverse health reactions to alleged odors, including internal reports of health conditions, medical visits, loss of work information. Additionally, all data and information from the other five EPA employees who inspected the New-Indy mill who apparently did not experience adverse health reactions during or after the inspections. See paragraph 30.
 - g. EPA's sample results from other potential sources of hydrogen sulfide. See paragraph 31.
 - h. Epidemiological, experimental, toxicological, and other studies referenced in paragraph 35 of the Order.
 - i. The EPA Region 5 May 5, 2021 GMAP Report for New Indy Containerboard referenced in paragraph 32 on page 10 of the Order, and in footnote 3 on page 7 of the Order.
3. All information and data collected regarding the wastewater treatment system inspection of New-Indy's mill that EPA conducted on April 26, 2021.
4. All information, data and reports of investigations that EPA has conducted of other potential sources of odor in the vicinity and the reasons for performing or not performing such investigations.